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Filing of Comments:

Before the Federal Communications Commission,
(WT Docket 98-20) Notice of Proposed Rulemaking,
GENERAL MOBILE RADIO SERVICE.

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As a licensed user of the General Mobile Radio Service I am very disturbed to learn of the pending, "NPRM" concerning possible changes to the licensing structure of the General Mobile Radio Service.

Many persons within the general public depend upon reliable 2-way radio communications for personal, and family uses of which the General Mobile Radio Service currently provides. Additionally, many emergency service and public safety organizations located throughout the United States rely heavily upon the General Mobile Radio Service, (GMRS) for their communications needs in support of disaster recovery operations, and in direct support of various non-profit, public service activities.

Many GMRS Licensees regularly volunteer their time, and GMRS communications resources, all in direct support of non-profit organizations such as; The American National Red Cross, The Salvation Army, REACT, The March of Dimes, The American Cancer Society, along with numerous other non-profit agencies and groups who are involved with public safety, and philintropthic activities.

These civilian volunteers depend heavily on reliable communications for the safety of the general public, as well as the safety of volunteer workers engaged in operational support services to their local communities and non-profit groups.

The importance of maintaining a licensed, and structured radio service such as the General Mobile Radio Service for the exclusive use of non-commercial entities is most vital. It must therefore be maintained in order to serve the best interests of the general public who utilize this radio service throughout our country.

Any attempt to reduce, or eliminate current FCC licensing procedures with the goal of moving the General Mobile Radio Service towards an un-regulated service such as, Citizens Band Radio, or the Family Radio Service would have a harmful impact to all users of the General Mobile Radio Service, reduce is effectiveness, and also lead to increased interference problems within its' current allocated spectrum.

Interference problems caused by stations who are un-licensed would have severe impact on what is presently a most reliable communication service.

While there may be room for easing some technical elements, or the modification of, the current FCC licensing structure for the General Mobile Radio Service, any actions taken must be done carefully, and also with full consideration towards the protection of all "current users" of the General Mobile Radio Service.

New users of this service would also continue to be served by continued licensing which provides all users with guidelines, and structure towards maintaining an effective communications service for all users.

My areas of specific concern under the proposed "NPRM"

(Docket WT 98-20) include any changes to, or the elimination of, the following sections as contained within current FCC PART-95 Rules:

Section: 95.29 CHANNELS AVAILABLE

95.29(a)

95.29(1)

95.29(2)

95.29(3)

The proposed deletion of this section would have a disastrous impact to all users who utilize mobile-relay stations, (repeaters) by allowing (simplex mode) transmissions to occur on input frequencies utilized by repeaters, and would therefore render these mobile-relay stations useless and unreliable.

Section: 95.47 CONSIDERATIONS IN LARGE URBAN AREAS

The proposed deletion of this section would greatly impact the effective use of the General Mobile Radio Service in large urban areas.

Additionally, if the technical guidelines for Control Stations are reduced, or deleted, they would have harmful impact, and may hamper effective communications.

The use of non-directional antenna systems by Control Stations, and excessive rf power levels, ie; more power than is necessary to access a mobile-relay station, would cause harmful, or destructive interference to co-channel users over wide operational areas.

Section: 95.59(c) CONTROL STATION POINTS

As a licensee, repeater owner, and user of the General Mobile Radio Service for over 10 years, the proposed deletion of this rule section in its' entirety is one which causes me great concern.

The effective control of user access to currently licensed,
Mobile-Relay Stations would be lost if this section were
eliminated.

Un-authorized access to, and the operation of, privately owned and operated Mobile-Relay Stations would lead to situations of, interference and intentional harm by many persons who would be permitted (legally) to "operate as they wish" if this section of the rules were deleted.

I have installed many Mobile-Relay Stations, technically supported the maintenance, operation, and site rental costs of those stations, and have also endured significant financial cost in my "not-for-profit" operation of these stations for many years.

My actions have been taken in direct support to the many volunteer organizations such as, REACT who depend heavily upon the General Mobile Radio Service for effective communications.

For persons not known to me, or for any other user of the General Mobile Radio Service to have access to these stations at their own accord, without prior permission from the owner / operator of a Mobile-Relay Station would cause disastrous results.

The effect of this would be felt almost immediately, especially in large urban areas such as, San Francisco, Los Angeles, and New York City where many systems are in current operation, and would cause problems for all current users by unknown, non-licensed stations.

Section: 95.75 BASIC INFORMATION

The FCCs' proposed elimination of PART-95, Section 95.75 would all but kill the General Mobile Radio Service!

While I sympathize that the Federal Communications

Commission has a tremendous responsibility to all users of
the rf spectrum within the United States, and in its' vital
role to protect, and effectively coordinate the use of those
resources, you must act in a manner which is fully
consistent in serving the best needs of the public.

The elimination of licensing, associated rules, and operational guidelines for the effective use of 2-Way Radio communications within the General Mobile Radio Service would not serve in the publics' best interest.

The proposed elimination of "BASIC INFORMATION" as contained within the current structure of the licensing process must not occur, but be maintained in its' current state in order to protect this vital communications resource, and also to insure the continued orderly operations of currently licensed stations, and to provide structure, and operational guidelines for any new stations who desire to make use of the General Mobile Radio Service.

With absolutely no collection of information thru an effective licensing process, if it were to be eliminated, there would be no means readily available to users thru which to contact other existing stations, or any new stations, for the purposes of cooperative shared use of frequencies, coordination of CTCSS Codes, and for resolution of interference problems.

Clearly this would not be in the publics' best interest should licensing be reduced or eliminated for the General Mobile Radio Service.

The Federal Communications Commission itself would also suffer greatly if licensing were to be eliminated within the General Mobile Radio Service. With no GMRS Database being available to FCC Field Office Engineers, listing licensees, station location, frequency, and area of operation, the commission would not be readily available to effectively act upon interference complaints or other enforcement actions.

There are also considerations as to lost revenue thru licensing fees collected by the commission that would be eleiminated if the General Mobile Radio Service were to become de-regulated.

I urge the commission to act responsibly in any actions that you may take with regard to reduction of, the deletion of sub-sections, or the total elimination of,

Federal Communications Commission Licensing for the

General Mobile Radio Service, as contained within

PART-95 of the commissions rules.

Respectfully Submitted,

Kevin J. Parrish

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